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Mr. Joseph J. Nowak, Case Manager
New Jersey Department of Environmental Protection
Bureau of Environmental Evaluation and Cleanup Responsibility Assessment
401 East State Street
PO Box 028
Trenton, NJ 08625-0028

Re: Hexcel Corporation
Lodi Borough, Bergen County
ISRA Case No. E86009

Dear Mr. Nowak:

I am writing in response to your letter of March 19, 2003, which we received on March 24, 2003. We are pleased that the Department has approved the Remedial Action Report dated December 20, 2002, which includes a surface water and sediment sampling plan. Below we respond to your comments in the order in which they appear in your letter. Based on your telephone conversations with Hexcel's consultant, Haley & Aldrich, we set forth a rationale in support of an extension request for submission of the results of sediment and surface water sampling, in light of the Department's requirement that the sampling be conducted during a low-flow period.

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I. Sediment Requirements

Hexcel concurs with the Department's first three comments and will:

1. use the methanol preservation technique when testing soils for volatile organic compounds;
2. implement a coring device as necessary to aid in the delineation of depositional areas; and
3. present the sampling results on scaled site maps.

With respect to item 4, the Department has requested that Hexcel specify the standards and screening criteria to which sediment data will be compared. Hexcel will consider using the sediment screen criteria provided in Table 1 of the November 1998 NJDEP Guidance for Sediment Quality Evaluations ("Ontario Criteria"). Hexcel does not concede, however, that the Ontario Criteria, or other guidance, are the correct, applicable, or appropriate standards for this case. The NJDEP has neither proposed nor adopted sediment cleanup standards. Without waiving the right to object to the application of the Ontario Criteria or other criteria, Hexcel will reference those criteria in its sampling results report.

II. Surface Water Requirements

The following responds to the four items in the Department's letter dated March 19, 2003.

1. Hexcel will collect the water samples close to the bed of the river, as requested.
2. Hexcel will conduct the sampling during the low-flow period estimated from the United States Geological Survey (USGS) data and approved by the NJDEP. This is discussed further under Section III General Requirements.
3. We understand that you were able to locate the sampling logs that were included in Appendix B of Haley & Aldrich's August 28, 2002 report. Hexcel is confident that the Department will agree that sampling groundwater or surface water for metals and base/neutral organic compounds is unnecessary.

Regarding item 4, the Department has requested that Hexcel specify the standards to which surface water data will be compared. Hexcel acknowledges that the recently adopted

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Technical Requirements for Site Remediation ("Tech Regs") consider surface water remediation standards as "the more stringent of either the numeric New Jersey Surface Water Quality Standards pursuant to N.J.A.C. 7:9B-1.14(c) and (d) or the numeric Federal Surface Water Criteria, 40 CFR Part 131." N.J.A.C. 7:26E-1.13(e). Hexcel understands that this portion of the Tech Regs may be again the subject of a legal challenge, and accordingly, Hexcel will reference those standards in its sampling results report, without waiving the right to object to the application of these standards.

As stated in our previous correspondence, Hexcel will implement the subject workplan but does not admit to any liability for contamination of the Saddle River or its sediments. Hexcel reserves its rights with respect to the Department's assertions that Hexcel has discharged and/or continues to discharge contaminants to the Saddle River.

III. General Requirements

Hexcel concurs with the Department's comments under this section, with the exception of the timing for the surface water sample collection. The Department has required that Hexcel submit the results of the sediment and surface water sampling within 90 days of the receipt of its letter. Accordingly, a results report is due by June 23, 2003. Hexcel will need an extension of time for submitting the results, because the timing of the sampling has not been established, as set forth below.

Pursuant to your discussions with Haley & Aldrich, implementation of the workplan within the presently established timeframe will not satisfy the Tech Regs, which require sampling during a low-flow period. You agreed and requested that Hexcel provide data showing when low-flow conditions typically occur in the Saddle River, in order for the Department to decide when it would prefer Hexcel to perform the sampling.

Enclosed is the data for the USGS stream gage designated as the station for Saddle River at Lodi, NJ. The stream gage is located approximately 1,000 yards upstream of the Hexcel site. The statistics of Monthly Mean Data for Water Years 1924-2001, as well as data for Water Year 2001 (October 2000 through September 2001), indicate that October has the lowest monthly mean discharge. The Monthly Mean Data for Water Years 1942-2001 also indicate that the additional discharge measured for July, August and September is within 10 percent of the October monthly mean discharge. Furthermore, the 2001 data indicates the discharge to be lower in the last two weeks of July compared to the early July. Therefore, in order to comply with data collection during the low-flow period, we propose the implementation of the sediment and surface water sampling workplan in mid to late July.

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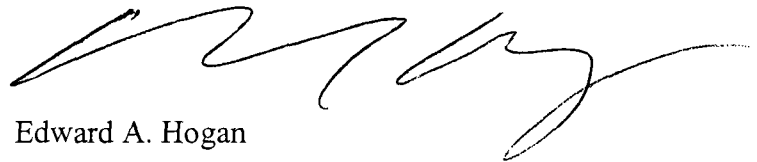
We request that the Department grant a 90-day extension for submission of the results. The new deadline would then be September 22, 2003. This will allow sufficient time for receipt of analytical data from the laboratory, data evaluation and preparation of results report.

Alternatively, we can accommodate sampling during this Spring if the Department's objectives require earlier sampling. In that case, however, we need your assurance that the data will not be rejected, because it will likely not correspond to a low-flow period. Hexcel remains flexible in meeting the Department's preference to the timing of sample collection. We await your guidance as to the Department's preferred timing of sample collection. Under this option, a results report would follow 60 days after the sample collection date.

We look forward to hearing from you as to the Department's preference for sampling, either this Spring or in July. Once the sample time is set, we can then provide a specific date on which you can expect the sampling results.

Thank you for your continued assistance on this project.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Edward A. Hogan', with a stylized, flowing script.

Edward A. Hogan

EAH/PTM/llk

Enclosure

cc: Rodney P. Jenks, Jr., Esq.
Mr. A. William Nosil
Mr. Joseph G. Savarese
Ms. Sunila Gupta

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